

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORIES
(DBP/USPS-1-5)**

The United States Postal Service today files its institutional responses to the above-identified interrogatories of David B. Popkin, dated May 30, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

Caroline R. Brownlie
Adriene M. Davis
James M. Mecone
Keith C. Nusbaum

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260
(202) 268-6525; Fax -5402
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**UNITED STATES POSTAL SERVICE
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DBP/USPS-1.

The Postal Service has filed a number of Library References in this Docket that contain large listings of various postal facilities in the format of an Excel spreadsheet. USPS-LR-N2012-2/1 has one spreadsheet and USPS-LR-N2012-2/2 has two spreadsheets.

[a] For each of these three spreadsheets please generically describe the type or categories of postal facilities that are included in the listing along with the approximate number of facilities in that listing.

[b] For each of these three spreadsheets please generically describe the type or categories of postal facilities that are NOT included in the listing along with the approximate number of facilities that are not included in that listing.

[c] For each of these three spreadsheets please fully describe each of the column headings and if there is a code shown the listing of the difference entries in that column.

RESPONSE

[a-b] USPS-LR-N2012-2/1 contains all POStPlan Offices, as defined in USPS-T-1.

Collectively, the two spreadsheets in USPS-LR-N2012-2/2 contain postal facilities with either Postmaster or Function 4 (clerk) positions, including POStPlan Offices. The number of facilities in each spreadsheet is available by reviewing the respective row numbers. All postal facilities not described above are necessarily excluded from the respective spreadsheets.

[c] The column titles accurately and completely describe the data in the columns.

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DBP/USPS-2.

[a] As the process is being implemented, how will members of the public be able to determine those offices that have become an RMPO and what the APO is for that facility?

[b] Will this information be shown on the usps.com website?

[c] If not, why not?

RESPONSE

[a-c] Hours of operation will continue to be available as they are today, including at Post Offices and on usps.com. Customers will be able to determine whether a particular Post Office is classified as an RMPO or PTPO based on retail window service hours. The Postal Service has not determined whether APO assignments will appear on the usps.com website.

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DBP/USPS-3.

[a] Is the PTPO determined by a 25-mile driving distance or by an airline distance?

[b] Please provide any guidelines that are provided to evaluate or determine that distance.

RESPONSE

[a] See pages 13-14 of the Direct Testimony of Jeffrey C. Day on Behalf of the United States Postal Service (USPS-T-1).

[b] Postal Service decisions regarding the 25-mile distance utilized the Microsoft MapPoint program.

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DBP/USPS-4.

Regarding the market research that was conducted in which customers had to choose between five options, please discuss and provide any insight as to why a customer would choose Option 1. For example, if Office A was going to be closed and Office B was a nearby office that would remain open, why would 15% of the survey respondents believe that it was better to have only Office B open rather than having BOTH offices A and B open?

RESPONSE

Please see library reference USPS-LR-N2012-2/4. The Questionnaire itself consists of all information presented to survey respondents. As such, the market research does not provide for an explanation responsive to this question.

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DBP/USPS-5.

[a] Regarding the market research that was conducted, options 2 and 3 provide for a different category of postal facility. Please provide a complete listing of the services that would be available in the type of facility contemplated in Option 2, in Option 3, and in an independent post office?

[b] Was this data provided to the survey participants?

[c] If not, why not?

RESPONSE

Please see library reference USPS-LR-N2012-2/4. Specifically, the

Questionnaire at Question P23 on page 10 contains the information provided to survey respondents regarding the options presented. The descriptions provided for Options 2 and 3 illustrate a range of services available through contractor-operated units and do not describe any particular facility type.